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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Criminal No. 12- 270(JAP)

v.

: 29 U.S.C. § 501(c)

GREGORY TAYLOR aka  
"Ronnie"

:

**I N D I C T M E N T**

The Grand Jury in and for the District of New Jersey,  
sitting in Newark, charges:

**Introduction**

**Counts One through Thirty Seven**  
**(Embezzlement from Local 1233)**

**Background**

1. At all times relevant to this Indictment unless  
otherwise stated:

**The Defendant and Other Entities**

(a) Local 1233 of the International Longshoreman's  
Association (hereinafter "Local 1233") was a "labor organization"  
within the meaning of the provisions of Title 29, United States  
Code, Sections 152(5), 402(i) and 402(j). It represented and  
admitted to membership individuals who worked on the Ports of New  
Jersey and New York.

(b) Defendant GREGORY TAYLOR was employed by Local 1233 as  
its Secretary Treasurer from in or about January 2005 to in or

about May 20, 2010. As such, he was an officer and representative of a labor union, pursuant to Title 29, United States Code, Section 402(q). According to the Constitution and By-Laws of Local 1233, the duties of Secretary Treasurer include: (1) receiving all monies paid to the union and depositing them into a union bank account; (2) co-signing checks from the union; (3) keeping true and accurate records of all of the union's financial transactions; (4) receiving authorization from the Executive Board in order to disburse union funds; and (5) reporting all financial transactions to the union's Auditing Committee.

(c) Defendant GREGORY TAYLOR, as Secretary Treasurer, was also a fiduciary and his duties and obligations, pursuant to Section 501(a) of Title 29, United States Code, were, among others: (1) to hold money and funds of Local 1233 solely for the benefit of the union and its members; (2) to manage and expend the union's funds in accordance with its constitution and by-laws; and (3) to avoid acting on his own behalf or for the benefit of any party whose interests were adverse to the interests of the union.

(d) Defendant GREGORY TAYLOR also possessed, without authorization, a credit card that was issued by American Express (the "AMEX card") to Local 1233. In addition, Bank of America issued defendant GREGORY TAYLOR two debit cards that were linked

to the Local 1233 operating account. Both the credit card and the debit cards were expected to be used for union related business and solely for the benefit of Local 1233 and its members. During the relevant time period, defendant GREGORY TAYLOR improperly exercised his authority to sign union checks and to make payments to American Express for personal expenses he generated from the Local 1233 operating account.

(e) ADP is a company that provides, among other things, payroll services, human resource management and employee benefits administration. Local 1233 retained ADP to administer the payroll for its employees. Each week, ADP calculated the gross payroll for each union employee and then generated the requisite payroll checks that were then mailed to the union. The payroll was funded by the union's operating account at Bank of America.

(f) In each year between 2007 and in or about February 2010, "petty cash" checks were issued from the union's operating account at Bank of America. These checks were not authorized by any Executive Board action, nor co-signed as required by the union's by-laws. These checks were purportedly issued to help pay for incidental expenses that arose during the normal course of Local 1233's operation, but in fact the \$300 monthly "petty cash" disbursements provided no apparent benefit to the union or its members and were solely for the benefit for defendant GREGORY TAYLOR.

g. Between November 2008 and December 2008, defendant TAYLOR, on behalf of Local 1233, purchased 1,050 gift cards valued at \$21,000 from Wakefern Food Corporation ("Wakefern") with two checks (#608 and #632) totaling \$20,000, purportedly for distribution to the union members for the 2008 Thanksgiving\ Christmas holiday period. Each gift card was worth \$20, although Wakefern discounted bulk purchases. Wakefern is the parent organization of Shop Rite supermarkets. The gift cards were redeemable at any Shop Rite store. Of the 1050 gift cards purchased for the members, 173 were used for the personal benefit of defendant Gregory Taylor.

h. On or about November 16, 2009, defendant TAYLOR purchased an additional 400 gift cards [discounted] for approximately \$7600 from Wakefern with a Local 1233 check (#8484). The gift cards were worth \$20 each and were to be distributed to the union members for the 2009 Thanksgiving\ Christmas holiday period. Of the 400 gift cards purchased for the members, 135 were used for the personal benefit of defendant Gregory Taylor.

2. On or about the dates set forth below, in Essex County, in the District of New Jersey and elsewhere, defendant

GREGORY TAYLOR aka "Ronnie"

while an officer and employee of Local 1233, a labor organization engaged in an industry affecting commerce, embezzled, stole, and

unlawfully and willfully abstracted and converted to his own use and the use of others, and caused to be embezzled, stolen, and unlawfully and willfully abstracted and converted to his own use and the use of others, money, funds, securities, property, and other assets of Local 1233, as described below:

Count	Approximate Date(s)	Funds Embezzled
ONE	May 31, 2007	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWO	August 28, 2007	extra paycheck resulting in \$2854 in unauthorized and improper salary
THREE	January 15, 2008	extra paycheck resulting in \$2854 in unauthorized and improper salary
FOUR	April 1, 2008	extra paycheck resulting in \$2854 in unauthorized and improper salary
FIVE	June 3, 2008	extra paycheck resulting in \$2854 in unauthorized and improper salary
SIX	July 11, 2008	extra paycheck resulting in \$2854 in unauthorized and improper salary
SEVEN	September 30, 2008	extra paycheck resulting in \$2854 in unauthorized and improper salary
EIGHT	October 24, 2008	extra paycheck resulting in \$2854 in unauthorized and improper salary
NINE	January 13, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary

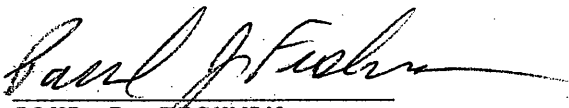
Count	Approximate Date(s)	Funds Embezzled
TEN	February 26, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
ELEVEN	March 10, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWELVE	April 29, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
THIRTEEN	May 6, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
FOURTEEN	May 12, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
FIFTEEN	June 23, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
SIXTEEN	June 30, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
SEVENTEEN	July 7, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
EIGHTEEN	July 22, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
NINETEEN	September 22, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWENTY	October 20, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWENTY ONE	October 27, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary

TWENTY TWO	November 25, 2009	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWENTY THREE	February 9, 2010	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWENTY FOUR	February 9, 2010	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWENTY FIVE	February 16, 2010	extra paycheck resulting in \$2854 in unauthorized and improper salary
TWENTY SIX	April 19, 2010	one paycheck representing four (4) weeks in unauthorized and improper vacation pay in the amount of \$7852
TWENTY SEVEN	from February 2007 to December 2007	nine (9) \$300 Petty cash checks totaling \$2700
TWENTY EIGHT	from January 2008 to December 2008	fourteen (14) \$300 Petty cash checks totaling \$4200
TWENTY NINE	from January 2009 to December 2009	sixteen (16) \$300 Petty cash checks totaling \$4800
THIRTY	from January 2010 to February 2010	two (2) \$300 Petty cash checks totaling \$600
THIRTY ONE	from November 2008 to December 2009	172 gift cards worth \$3,440.
THIRTY TWO	from November 2009 to December 2009	135 gift cards worth \$2,700.
THIRTY THREE	on or about April 1, 2009	round-trip airline tickets from New Jersey to Santo Domingo, totaling \$1,241.80
THIRTY FOUR	on or about November 23, 2009	round-trip airline tickets from New Jersey to Colombia, totaling \$1,138.90

THIRTY FIVE	on or about January 18, 2010	round-trip airline tickets for travel from New Jersey to Abidjan (Ivory Coast of Africa) totaling \$1,460
THIRTY SIX	on or about February 22, 2010	charges for changes to the Abidjan travel itinerary totaling \$1,614
THIRTY SEVEN	on or about February 22, 2010	round-trip airline tickets for travel from New Jersey to Santo Domingo totaling \$401.80

All in violation of Title 29, United States Code, Section  
501(c).

A TRUE BILL,



PAUL J. FISHMAN  
United States Attorney



CASE NUMBER: 3:12cc270(JAP)

United States District Court  
District of New Jersey

UNITED STATES OF AMERICA

v.

Gregory Taylor

**INDICTMENT FOR**

TITLE 29 USC § 501(c)

**PAUL J. FISHMAN**

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